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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

|                           |   |                            |
|---------------------------|---|----------------------------|
| UNITED STATES OF AMERICA, | ) | No. CR 11-0811 EMC         |
|                           | ) |                            |
| Plaintiff,                | ) |                            |
|                           | ) | STIPULATION AND [PROPOSED] |
| v.                        | ) | ORDER CONTINUING MOTIONS   |
|                           | ) | HEARING TO MAY 23, 2012    |
| MEDCHEM CORPORATION, and  | ) |                            |
| HASAN IBRAHIM             | ) |                            |
|                           | ) |                            |
| Defendants.               | ) |                            |

Through counsel, the parties hereby stipulate and agree as follows:

1. Defendants Hasan Ibrahim and MedChem Corporation have filed two motions, which are currently set for hearing on May 16, 2012. *See* Clerk's Record (CR) 30 (Motion to Dismiss), 31 (Motion to Settle Jury Instructions). Under the current briefing schedule, the government's oppositions are due on April 25 and the defendants' replies are due on May 2.

2. At the government's request, the parties have agreed to a one-week continuance of the hearing date and briefing schedule. Government counsel made this request because he was occupied with an extensive filing in *United States v. Pangang Group Company, Ltd.*, CR 11-0573 JSW (*see* CR 121-136) through April 19, 2012.

3. Subject to the Court's approval, the parties agree to the following schedule:  
government's oppositions due on May 2, defendants' replies due on May 9, and motions' hearing  
on May 23, 2012 at 2:30 p.m.

SO STIPULATED:

4/23/12  
\_\_\_\_\_  
DATE

/s/  
\_\_\_\_\_  
PETER B. AXELROD  
Assistant United States Attorney

4/23/12  
\_\_\_\_\_  
DATE

/s/  
\_\_\_\_\_  
JAMES McNAIR THOMPSON  
Attorney for Hasan Ibrahim and MedChem Corp.

**ORDER**

Based on the parties' stipulation, and for good cause appearing, the Court continues the  
hearing on the defendants' motions to dismiss and settle jury instructions (CR 30 and 31),  
currently set for May 16, 2012, to May 23, 2012, at 2:30pm. The governments' oppositions to  
these motions are now due on May 2, 2012, and defendants' replies are due on May 9, 2012.

IT IS SO ORDERED.

DATED: April 24, 2012  
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